



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

Certified Mail:
Return Receipt Requested

September 18, 2015

Mr. Tom Bajema
Director of Safety and Regulatory Compliance
Site Operator Representative (BPI)
The Brenntag Group
10747 Patterson Place
Santa Fe Springs, CA 90670-4043

SUBJECT

Access to: Brenntag Pacific, Inc. Site
CERCLIS EPA ID: CAD008287732
Los Angeles County Assessor Parcel Number(s): 6215-002-007;
6215-002-008; 6215-002-0014; 6215-002-021; 6215-002-022.

Investigation Activities: Subsurface Soil and Groundwater Sampling

Dear Mr. Bajema,

The U.S. Environmental Protection Agency (EPA) is conducting a Site Inspection (SI) at the subject site, Brenntag Pacific, Inc. (Brenntag), pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §9601 et seq. EPA requests that you sign the attached Access Agreement authorizing EPA to conduct the investigation activities, identified above, on your property.

The Brenntag site was brought to the attention of EPA by the California Department of Toxic Substances Control (DTSC) as part of a joint effort in identifying potential sources of volatile organic compounds (VOC) and metals contamination in ground water in the vicinity of the "710 Corridor" area. The Preliminary Assessment (PA) Report for the site, which was completed by

EPA in April 2015, finds that there is evidence to indicate that a release of hazardous substances, primarily VOCs and metals, to groundwater may have occurred from one or more sources at the site based on the historic use and storage of hazardous substance at the site. Analytical data taken at the site and the immediate area also substantiates this concern. Some of substances found on-site have also been found in adjacent public drinking water wells. The regional groundwater flow direction within the deeper aquifers in the vicinity of the site generally trends towards the southwest with temporal fluctuations from west to south-southwest. The nearest impacted drinking water well, which was closed in 2002 due to VOC and metals contamination, was located approximately 0.44 mile southeast of the site. There are another 167 drinking water wells within 4 miles of the site that include one non-impacted well, which is 900 feet to the northeast, and another impacted well that is 0.58 mile to the east-northeast, which was closed in 2000 due to metals contamination. Many of the remaining drinking water wells in the 4 mile radius are hydrologically downgradient from the site and could potentially be impacted by aquifer contamination from the site.

Based on the information presented in the April 2015 PA Report, EPA has determined that the Brenntag site has the potential to qualify for the National Priorities List (NPL). However, in order to substantiate if a release of these substances to area groundwater has occurred, EPA will need to conduct a Site Investigation (SI), which will include sampling of soil and groundwater both on, and adjacent to, the site.

Weston Solutions, Inc. (WESTON), is EPA's contractor who will be performing the SI sampling under EPA's direction. WESTON will be responsible for the overall coordination of the investigation and for ensuring the execution of the project within the anticipated schedule and in accordance with reasonable requirements made by property owners or designees.

The SI Sampling investigation will include the advancement of up to eight (8) direct push borings to approximately 60 feet bgs and six (6) additional cone penetration testing (CPT) borings to approximately 150 feet bgs. In addition, fourteen (14) existing on- and off-site groundwater monitoring wells will be sampled during the investigation. Eighteen (18) of the 28 locations will be located on the parcel(s) occupied by the Brenntag Pacific, Inc. facility. A figure illustrating the proposed sample locations is enclosed (Attachment A). Soil matrix samples will be collected from four (4) distinct depths at all eight (8) of the direct push locations. Shallow groundwater samples will be collected from two (2) distinct depths at three (3) of the eight (8) direct push locations. Shallow and deeper groundwater samples will be collected from three (3) distinct depths at all six (6) of the CPT locations. Shallow or deeper groundwater (dependent on well screen depth) will be collected from all fourteen (14) of the existing on- and off-site monitoring wells. These sample location totals include the entirety of the investigation and include those parcel(s) identified in the subject line as well as public right-of-ways.

Once completed, the final Sampling and Analysis Plan (SAP) for the investigation will be provided to you in a digital format, which is anticipated to occur by Friday, September 25th, 2015. In addition, a hardcopy of the SAP can be mailed to you upon your request. It should be noted that the SAP is final and is subject to your review, but not your approval. EPA will, of course, consider any clarifying questions or comments you may have on the SAP, but we will not consider those binding.

The owner and/or operator of the subject site may request that 'split-samples' be provided for each sample collected during the investigation. EPA will make a reasonable effort to grant this request if such request does not adversely impact the integrity of the investigation or the overall schedule of work. EPA will not provide sample containers for the 'split-samples' nor can EPA guarantee that sufficient sample volume will be collected for multiple sets of samples, in which case EPA sample volumes will be prioritized. In addition, if actual field conditions require a modification in the tentative schedule, EPA will make a reasonable effort to notify the owner and/or operator representative(s) of the change; however, EPA cannot guarantee that sufficient notification will be provided to allow for the representative to remobilize to the site.

Approximately two weeks prior to the advancement of the borings, a geophysical survey will be conducted to identify any underground utilities, tanks, or other obstacles that may exist on or near all sampling locations at the site. In addition, Underground Service Alert of Southern California (i.e., DigAlert) will be notified at least 72 hours before drilling commences.

During the sampling event, industrial derived waste (IDW) may be accumulated. Up to one (1) 55-gallon drum of soil cuttings and one (1) 55-gallon drum of purge groundwater/decontamination fluids will be required to be left on the subject site at a location deemed suitable by the site owner or operator, pending laboratory analysis. Appropriate IDW disposal arrangements will be coordinated by WESTON subsequent to the reception of analytical findings at no costs to the site owner or operator.

EPA requests access to the subject site for the following times and purposes:

- 1) Period: Friday, October 9th, 2015
Purpose: Installation of sampling devices in existing wells

It is anticipated that the installation of the HydraSleeve sampling devices within the fourteen existing on- and off-site monitoring wells will require approximately eight (8) hours on the subject site, which is tentatively scheduled for Friday, October 9th, 2015. This activity will be conducted in cooperation with Brenntag Pacific Inc.'s consultant, Arcadis, as part of their semi-annual sampling event. No sampling will be conducted during this time period. In addition to EPA and any representatives of California state or local environmental regulatory agencies, the following firms will require access to the site during this time period:

WESTON

- 2) Period: Monday, October 12th through Friday, October 16th, 2015
Purpose: Geophysical survey

It is anticipated that the geophysical survey will require approximately eight (8) hours on the subject site, which is tentatively scheduled for Wednesday, October 14th and Thursday, October 15th. However, to account for fieldwork uncertainties, EPA requests access to the

subject site for the entirety of the period stated above. No sampling will be conducted during this time period. In addition to EPA and any representatives of California state or local environmental regulatory agencies, the following firms will require access to the site during this time period:

WESTON
ULS Services Corporation

- 3) Period: Wednesday, October 26th through Friday, October 28th, 2015
Purpose: SI groundwater sampling – existing wells.

It is anticipated that the sampling of the existing on- and off-site monitoring wells will require approximately three (3) days and will be conducted in cooperation with Brenntag Pacific Inc.'s consultant, Arcadis, as part of their semi-annual sampling event. The samples will be collected by an EPA contractor who will be utilizing a Hydrasleeve sampling device. In addition to EPA and any representatives of California state or local environmental regulatory agencies, the following firms will require access to the site during this time period:

WESTON

- 4) Period: Monday, November 2nd through Friday, November 20th, 2015
Purpose: SI soil and groundwater sampling – direct push

It is anticipated that the investigation will require approximately three (3) days to complete and is tentatively scheduled for Wednesday, November 11th through Friday, November 13th, 2015. However, to account for fieldwork uncertainties, EPA requests access to the subject site for the entirety of the period stated above. The samples will be collected by an EPA contractor who will be utilizing a direct push drilling rig and a CPT drilling rig. Each drilling rig will be accompanied by two EPA contractors and a 2-man drilling crew. In addition to EPA and any representatives of California state or local environmental regulatory agencies, the following firms will require access to the site during this time period:

WESTON
Gregg Drilling & Testing, Inc.

An Access Agreement providing permission for EPA and its contractors to access your property is included as Attachment B and is accompanied by an addressed, stamped envelope for returning the signed agreement to EPA. Please return your signed Access Agreement to me by Friday, October 7th, 2015.

Upon signing the Access Agreement, please coordinate with the WESTON Field Project Manager, Brian Reilly, at (541) 593-3800 (office) or (541) 771-4397 (mobile) to discuss logistics.

Please be aware that EPA has the right to access private property pursuant Section 104(e)(4)(A) of CERCLA, 42 U.S.C. §9601 et seq. This section states that "any officer, employee, or representative is authorized to inspect and obtain samples from any vessel, facility, establishment, or other place or property or from any location of any suspected hazardous substance or pollutant or contaminant." If EPA cannot arrange for voluntary access, EPA is authorized to issue an administrative order for access, under which failure to comply is subject to civil penalties of up to \$27,500/day.

In summary:

1. The Hydrasleeve installation activity is tentatively scheduled for October 9, 2015; the geophysical survey sampling activity is tentatively scheduled for October 14-15, 2015; the direct push sampling activity is tentatively scheduled for October 26-28, 2015; and the direct push sampling activity is tentatively scheduled for November 11-13, 2015
2. Access to the subject site and parcels is requested for the periods of October 9, 2015 (Hydrasleeve installation), October 12-16, 2015 (geophysical survey), October 26-28 (well sampling), and November 2-20, 2015 (sampling effort).
3. Return your signed Access Agreement (Attachment B) to EPA in the stamped, addressed envelope by October 7, 2015.
4. Upon signing the Access Agreement, coordinate with Brian Reilly of WESTON to discuss investigation logistics.

EPA appreciates your cooperation in promptly returning your signed Access Agreement to EPA by October 7th, 2015. If you have any questions regarding the project, you can reach me at (415) 972-3096 or the EPA Attorney, Andrew Helmlinger, (415) 972-3904.

Sincerely,



Matt Mitguard, Site Assessment Manager
United States Environmental Protection Agency
Superfund Division

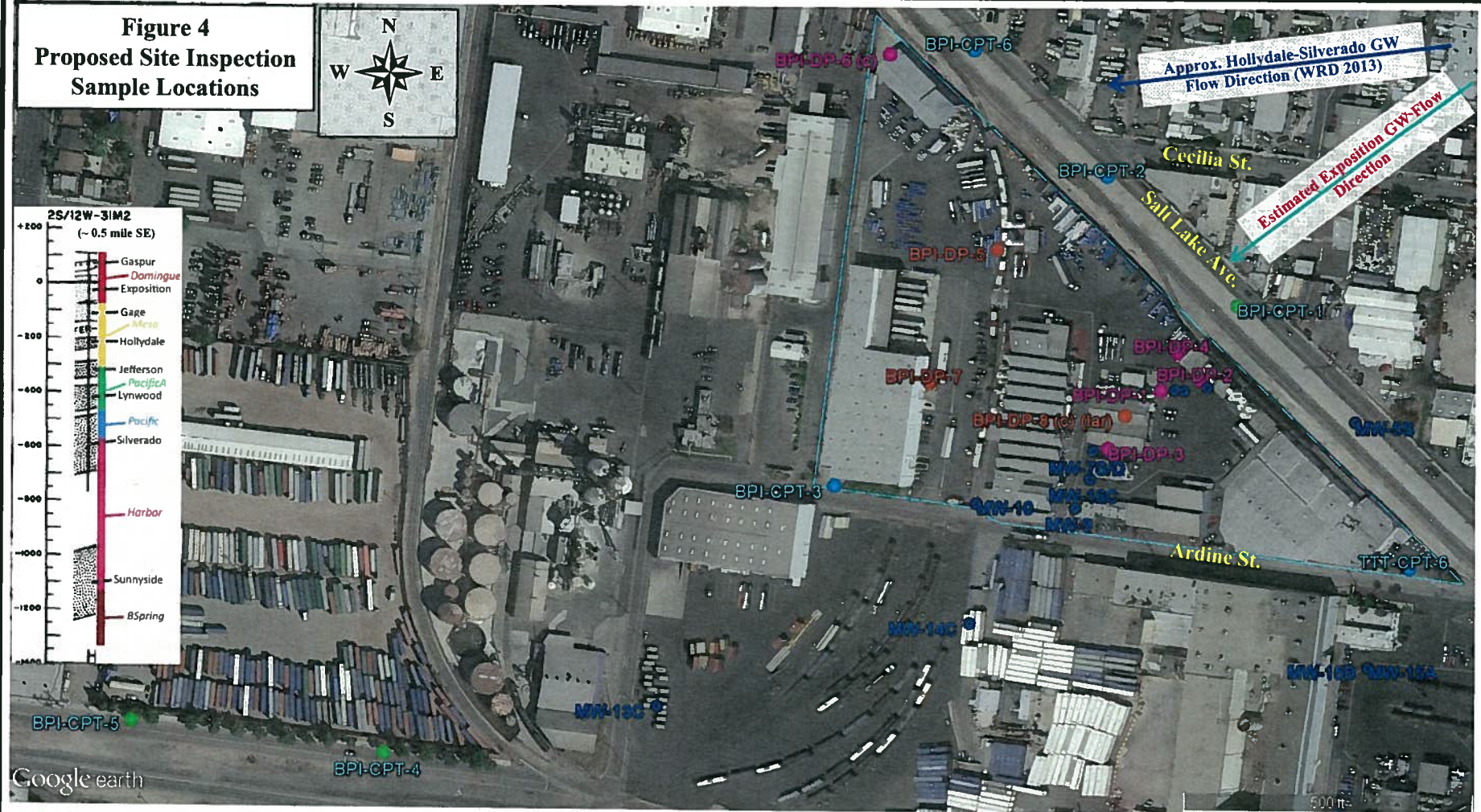
Encl:

Attachment A: SI Sample Locations

Attachment B: Access Agreement and stamped envelope

cc: Joe DeFao, Weston Solutions, Inc.
Javier Hinojosa, CA Department of Toxic Substances Control
Patrick Movlay, DTSC
Andrew Helmlinger, EPA
file

Figure 4
Proposed Site Inspection
Sample Locations



- **Proposed Combined Direct Push Soil/Groundwater Grab Sample Location**
[Two discrete-depth Groundwater (~35 & 60 ft-bgs) and Soil Matrix (2, 5, 10, & 15 ft-bgs)]
(3 Locations = BPI-DP-5, BPI-DP-7, & BPI-DP-8)
- **Proposed Direct Push Soil Sample Location [Soil Matrix only (2, 5, 10, & 15 ft-bgs)]**
(5 Locations = BPI-DP-1 through BPI-DP-4, & BPI-DP-6)
- **Proposed Groundwater Grab Sample Location (~60, 90, & 130 ft-bgs)**
(6 Locations = BPI-CPT-1 through BPI-CPT-6; No CPT log required at BPI-CPT-1, BPI-CPT-4, & BPI-CPT-5)
- **Existing Monitoring Well - Groundwater Grab Sample Location (various depths - 'S/D' indicates nested pair) (some MW labels were omitted from figure to aid in presentation)**
(11 Locations = 14 Wells (B-MW-1, B-MW-5S, B-MW-6S/D, B-MW-7S/D, B-MW-8, B-MW-9, B-MW-10, B-MW-13C, B-MW-15A/B, B-MW-16C))

Brenntag Pacific, Inc.
4545 Ardine Street
South Gate, CA

All Soil and GW Samples to be analyzed for VOCs and Metals

Total Samples (not including QC): 38 groundwater samples
24 soil matrix samples

Note: Proposed Groundwater Sample Location TTT-CPT-6 is logistically associated with an adjacent site and is not included with the sample totals.

Draft Revision Date: September 15th, 2015. Disregard all undated and previous dated draft versions.



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**75 Hawthorne Street
San Francisco, CA 94105**

ACCESS AGREEMENT

Subject: Access to Brenntag Pacific, Inc. Property

**Assessor Parcel Number(s): 6215-002-007; 6215-002-008;
6215-002-0014; 6215-002-021;
6215-002-022.**

EPA Site Name: Brenntag Pacific, Inc.

EPA ID Number: CAD008287732

I consent to officers, employees, contractors, and authorized representatives of the United States Environmental Protection Agency (EPA) entering and having continued access to this property for the following purposes and time periods:

1. Hydrasleeve Installation – October 9th, 2015.
2. Geophysical Survey – October 12th through 16th, 2015.
3. Site Inspection Monitoring Well Sampling – October 26th through 28th, 2015.
4. Site Inspection Soil and Groundwater Sampling – November 2nd through November 20th, 2015.

I realize that these actions taken by EPA are undertaken pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §9601 et seq.

This written permission is given by me voluntarily, on behalf of myself and all other co-operators of this property, with knowledge of my right to refuse and without threats or promises of any kind.

Date

Signature

Print name, title

Note: Please return this agreement using the self-addressed and franked envelope provided